

# EXHIBIT E

**From:** "Nickerson, Morgan T." <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Date:** November 22, 2022 at 5:20:38 PM EST  
**To:** "Nicholas A. Rendino" <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** "Christine A. Montenegro" <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>, "Jason S. Takenouchi" <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>, "McDevitt, Jerry" <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>, "Kelley, Derek W." <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>, "Finnerty, Christopher S." <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Hi Nick,

With the motion to dismiss still pending, we do not believe it prudent to utilize resources on the Proposed Fact Deposition Protocol or the Proposed Expert Discovery Protocol. However, we can revisit those protocols at a future date should it become necessary.

Best,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Monday, November 21, 2022 2:50 PM  
**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Thanks, Morgan. We will review and get back to you. We see you didn't send along any edits to the Proposed Fact Deposition Protocol or the Proposed Expert Discovery Protocol – is that because you do not have any edits to those documents or are those edits forthcoming?

Regards,  
Nick

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**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Sent:** Monday, November 21, 2022 11:33 AM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Nick,

Attached please find my client's proposed edits to the (1) Joint 26(f) Report, (2) Proposed Protective Order, and (3) Proposed ESI Protocol. Kindly let us know if you have any further proposed edits to the same.

Best regards,

Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Tuesday, November 15, 2022 6:43 PM  
**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Morgan,

Following up on our meeting, do you have a sense of when we can expect to see edits to the protocols and the Joint 26(f) Report?

Thanks,  
Nick

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**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Sent:** Tuesday, November 8, 2022 2:42 PM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Thursday at 3pm est works for me. I will circulate dial in information.

Best,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Tuesday, November 08, 2022 2:25 PM  
**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Hi Morgan,

We are available between 2-5 p.m. If that works for you all, please feel free to circulate an invite and dial-in.

Regards,

Nick

---

**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Sent:** Tuesday, November 8, 2022 1:39 PM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Hi Nick,

As to the protective order, it has come to my attention that MLW's GC may be married to MLW's CEO. Can we set up a quick call on Thursday to discuss how to handle the same with respect to the PO? If you are free, let me know some times that work for you and we can match calendars.

Best regards,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Friday, October 07, 2022 8:07 AM  
**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Morgan,

Following up on our call, attached please find our proposed edits to the Joint Rule 26 (f) report. We have also attached the following for your consideration:

1. A draft Proposed ESI Protocol
2. A draft Proposed Protective Order
3. A draft Proposed Fact Deposition Protocol
4. A draft Proposed Expert Discovery Protocol

We are happy to discuss any of the above if that would be helpful.

Regards,  
Nick

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**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Sent:** Wednesday, October 5, 2022 5:00 PM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W.

<[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Nick,

As discussed below, we believe it more efficient to conduct a Rule 26 conference with a working draft of the joint report guiding the discussion. To that end, we have prepared the attached for discussion on tomorrow's call. We look forward to discussing the same.

Best regards,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>

**Sent:** Wednesday, September 28, 2022 1:36 PM

**To:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>

**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Morgan,

We are prepared to discuss the issues required for the joint case management statement during the 26(f) conference and will circulate a draft joint case management statement following our discussion on October 6. As you know, there are issues we need to discuss during the conference (such as a proposed discovery schedule or other planning or discovery orders), so we think it makes more sense to circulate a draft which incorporates each party's position after we have had the benefit of our discussion.

Best,  
Nick

---

**From:** Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>

**Sent:** Tuesday, September 27, 2022 3:21 PM

**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>

**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>

**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Nick,

Judge Davila's standing order and Local Rule 16-9 require the parties to submit a joint case management statement. Judge Davila requires parties to file the joint statement no later than 10 days before the case management conference (i.e., October 17). Please let us know if you plan to circulate a draft ahead of the Rule 26(f) conference that we can consider and discuss at the same.

Best regards,  
Morgan

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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Thursday, September 22, 2022 10:19 AM  
**To:** Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

Thanks, Chris. That works for us – I will send around an invite and dial-in.

Best,  
Nick

---

**From:** Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>  
**Sent:** Thursday, September 22, 2022 9:55 AM  
**To:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>; Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>  
**Subject:** RE: MLW v. WWE - Rule 26(f) Conference

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Hi Nick,

How about 2PM EST on 10/6?

Best,

Chris



**Christopher S. Finnerty**  
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K&L Gates LLP  
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One Lincoln Street  
Boston, MA 02111  
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**From:** Nicholas A. Rendino <[nrendino@kasowitz.com](mailto:nrendino@kasowitz.com)>  
**Sent:** Wednesday, September 21, 2022 5:20 PM  
**To:** Finnerty, Christopher S. <[Chris.Finnerty@klgates.com](mailto:Chris.Finnerty@klgates.com)>; McDevitt, Jerry <[Jerry.McDevitt@klgates.com](mailto:Jerry.McDevitt@klgates.com)>; Nickerson, Morgan T. <[Morgan.Nickerson@klgates.com](mailto:Morgan.Nickerson@klgates.com)>; Kelley, Derek W. <[Derek.Kelley@klgates.com](mailto:Derek.Kelley@klgates.com)>  
**Cc:** Christine A. Montenegro <[CMontenegro@kasowitz.com](mailto:CMontenegro@kasowitz.com)>; Jason S. Takenouchi <[JTakenouchi@kasowitz.com](mailto:JTakenouchi@kasowitz.com)>  
**Subject:** MLW v. WWE - Rule 26(f) Conference

Chris,

As you know, the parties are required to hold their Rule 26(f) conference “as soon as practicable” after the case is filed, and at the latest by October 6. We are available all day on October 5 or before 4:30 p.m. ET on October 6. Please let us know if there is a time during those days that works for you.

Regards,  
Nick

Nicholas A. Rendino  
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